

UNITED STATES DISTRICT COURT
FOR THE
MIDDLE DISTRICT OF NORTH CAROLINA
No. 1:11-cv-812

DISABILITY RIGHTS NORTH)	
CAROLINA,)	
)	
Plaintiff,)	
)	
v.)	PLAINTIFF’S MOTION FOR
)	JUDGMENT ON THE PLEADINGS
)	
THE MOSES H. CONE MEMORIAL)	
HOSPITAL OPERATING)	
CORPORATION, d/b/a MOSES CONE)	
HEALTH SYSTEM, d/b/a CONE)	
HEALTH BEHAVIORAL HEALTH)	
HOSPITAL,)	
)	
Defendant)	
)	

Plaintiff Disability Rights North Carolina (“DRNC”) moves the Court pursuant to Rule 12(c) of the Federal Rules of Civil Procedure to enter judgment on the pleadings against the Moses H. Cone Memorial Hospital Operating Corporation (“Cone Health”). The pleadings are now closed, and the allegations of the complaint and admissions of the answer show that there are no issues of material fact in dispute before the Court. The pleadings also show that Plaintiff is entitled to the relief sought in its complaint.

For the foregoing reasons and for the reasons set forth in Plaintiff’s supporting brief, which has been submitted along with this motion, Plaintiff respectfully requests that the Court enter judgment for Plaintiff as to each of Plaintiff’s claims and award such further relief as the Court deems just and proper.

This 7th day of February, 2013.

Respectfully submitted,

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Certificate of Service

The undersigned hereby certifies that on February 7, 2013, I electronically filed the foregoing Motion for Judgment on the Pleadings with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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Respectfully submitted,

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